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9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**  
16 **COMPANY,**

17 **Debtors.**

18  Affects PG&E Corporation  
19  Affects Pacific Gas and Electric Company  
20  Affects both Debtors

21 \* *All papers shall be filed in the Lead Case, No.*  
22 *19-30088 (DM).*

23 Bankruptcy Case No. 19-30088 (DM)

24 Chapter 11

25 (Lead Case) (Jointly Administered)

26 **REORGANIZED DEBTORS' REPORT ON**  
27 **RESPONSES TO ONE HUNDRED**  
28 **NINETEENTH OMNIBUS OBJECTION TO**  
29 **CLAIMS AND REQUEST FOR ORDER BY**  
30 **DEFAULT AS TO UNOPPOSED**  
31 **OBJECTION**

32 [Re: Dkt. No. 13238]

33 **Regarding Objections Set for Hearing**  
34 **December 20, 2022, at 10:00 a.m. (Pacific Time)**

## **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule  
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District  
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**  
8 **Management Order**”), that the Court enter an order by default on the *Reorganized Debtors’ One*  
9 *Hundred Nineteenth Omnibus Objection to Claims (No Liability Claims)* [Docket No. 13238] (the  
10 “**Omnibus Objection**”):

## **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibit 1 to the Omnibus Objection.

## **NOTICE AND SERVICE**

The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection [Docket No. 13240]. The Omnibus Objection was also supported by the declaration of A. Anna Capelle [Docket No. 13239]. The Omnibus Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on November 16, 2022 [Docket No. 13258]: each holder of a claim listed on Exhibit 1 to the Omnibus Objection received a notice customized to include the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Omnibus Objection has passed. The Reorganized Debtors have received the following response:

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
13297	Gabriel Froymovich	7955	The Reorganized Debtors have reached a settlement of this Claim that resolves the Omnibus Objection.

## **DECLARATION OF NO OPPOSITION RECEIVED**

2 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

3           1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the  
4 Reorganized Debtors.

5       2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no  
6 responses have been filed with respect to the Omnibus Objection except as described herein.

7 3. This declaration was executed in San Francisco, California.

8 WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and  
9 expunging the Proof of Claim listed in **Exhibit 1** to this Request, which listed Claim is identical to  
10 those listed in Exhibit 1 to the Omnibus Objection, except as otherwise discussed above.

11 | Dated: December 13, 2022

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors and Reorganized Debtors*

## Exhibit 1

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Seymour, Jessica 2718 N Bowdish Rd, Apt 343 Spokane Valley, WA 99206	92045		PG&E Corporation and Pacific Gas and Electric Company	12/29/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Claims
<b>Claims To Be Expunged Totals</b>		<b>Count:1</b>			<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	